

REMARKS

In response to the above-identified Office Action, Applicant seeks reconsideration in view of the following remarks and the amendments reflected in the claim listing above. No new matter has been added.

I. Claim Rejections – 35 U.S.C. §103

Claims 19-28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Pat. No. 5,898,679 (“Brederveld”) in view of Arrowood. This rejection is respectfully traversed.

The Examiner argues that Brederveld teaches server communication with the remote unit via the wireless APs. "Hence, the server supports centralized filtering and forwarding of data to the remote units." Applicants respectfully submit that the fact that a server communicates with the remote unit does not imply that the server supports centralized filtering and forwarding of data as claimed. Referring to the claims, please note that they recite that the server "provides the functionality of the wireless communication standard protocol that maintains centralized filtering and forwarding of data to be transmitted to the remote units." That is, the traditional filtering and forwarding usually included in traditional APs that operate in accordance with a standard wireless protocol (e.g., 802.11) is moved to the server. As previously noted, Brederveld provides a wireless relay that uses repeated transmission from an end-station in the event that the transmission fails. Traditional APs (e.g., 802.11 APs) traditionally include a specified set of functionality, including the functionality pertaining to filtering and forwarding of transmissions to the appropriate remote unit.

Arrowood, on the other hand, discloses “path tables” or “path status tables” 36 (see, e.g., Fig. 2) that keep track of all possible paths from and to a particular network node, and this table “is established in each Agent node of the network.” (Col. 2, lines 9-10). Each agent node then sends data packets “along the calculated route from the originating node to the destination node . . . by placing the route in the header of the data packet.” (Col. 4, lines 16-20). This system is *more* complex than the prior art. That is, in Arrowood, not only does each node have to deal with “filtering and forwarding” (in contrast to the centralized filtering and forwarding recited in the present claims),

each node has the added complexity of storing *every possible path* from and to itself within the network. (Col. 5, lines 20-23). Thus, if Brederveld were combined with Arrowood, the resulting system would be an unsatisfactory and complex network where each AP, server, and mobile unit includes a “path status table” and takes care of its own filtering and forwarding functions.

In this context, the present inventor realized that due to the increasing need for applications that must support a high volume of data communications from a large number of users simultaneously, the number of access points in a given wireless network (e.g., a network conforming to a standard that traditionally included such functionality in an access point) would increase significantly, leading to undesirable cost and complexity. In contrast, Brederveld teaches *away* from the present invention in that, to provide the selective repeater functionality, he notes that “one or more relays (or repeaters) may be incorporated into mobile stations, access points, or both.” (col. 4, lines 55-60). As previously mentioned, not only is Brederveld making the system *more* complex by incorporating additional components and software within multiple mobile stations and/or access points, he at no time contemplates that the selectivity associated with the repeater functionality might be centralized at the server or elsewhere (e.g., server 105 in Fig. 1 of Brederveld).

Furthermore, as previously argued, Applicant submits that the Examiner’s conclusion with respect to the advantages of moving certain functionality to a centralized server is impermissible hindsight. MPEP 2145(X)(A). A person of ordinary skill in the art with the level of knowledge available at the time the invention was made would not have appreciated the benefits of moving a subset of the traditional access point functionality specified in a standard (e.g., the IEEE 802.11 specification) to a centralized server. The inventor was clearly proceeding contrary to accepted wisdom. MPEP 2145(X)(D)(3).

The Examiner also argues that “the claim lacks how the data is filtered or forwarded or has structure to further limit the claim.” Applicants disagree, but in the interest of compact prosecution have amended claim 19 to recite the nature of the data being forwarded and filtered -- i.e., that it includes a packet destination address and packet source address that are used in conjunction with the destination table.

Accordingly, Applicants respectfully submit that Brederveld, taken alone or in combination with any other art or record, would not include each and every element of claim 19 as currently

amended, and furthermore that there is no motivation to combine this reference with the prior art. As the remaining claims variously depend from claim 19, they are non-obvious for at least the reasons set forth above. Applicants therefore request that the Section 103 rejections be withdrawn.

II. Conclusion

In view of the foregoing, it is believed that all claims now pending are in condition for allowance. A Notice of Allowance is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (480) 385-5060 or dpote@ifllaw.com.

If necessary, the Commissioner is hereby authorized to charge payment or credit any overpayment to Deposit Account No. 50-2091 for any fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

Respectfully submitted,
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